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May 11, 2020

Via ECF

Honorable Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Court Room 415
New York, New York 10007

Re: Jessica Wroblewski v. Little Flower Children & Family Services, et al.
Index No.: 18-CV-8208 (VSB)
Our File Number: 6225.1598

Honorable Justice Broderick:

We represent defendants Little Flower Children and Family Services (“Little Flower”), Barbara Simon, and Sheila Johnson in the foregoing matter. We write on behalf of Little Flower, Simon, and Johnson, jointly with counsel for defendants The City of New York and David Usdan, in response to the Court’s April 30, 2020 Order of Service. (DKT # 61).

The defendants jointly wish to proceed with briefing the motions to dismiss and seek an extension of time to reply to the plaintiff’s lengthy opposition, and to address novel arguments asserted by the plaintiff for the first time in her purported opposition to defendants’ motions.

It is the defendants’ joint position that proceeding with motions already filed “is a sound approach that promotes judicial economy by obviating the need for multiple rounds of briefing addressing complaints that are legally insufficient.” *Pettaway v. Nat’l Recovery Sols., LLC*, 955 F.3d 299, 303 (2d Cir. 2020).

Plaintiff’s opposition to the motions to dismiss (DKT # 59) exceeds this Court’s permitted page limit and annexes voluminous exhibits labeled A through Y. Accordingly, defendants jointly request an extension of time to file their reply motions and permission to submit reply briefs in excess of the ten (10) page limitation, not to exceed twenty (20) pages.

Judge Broderick

May 11, 2020

Page 2

The extension of defendants' response deadline is premised upon the difficulties imposed by the ongoing health crises and the voluminous opposition filed by the plaintiff. Defendants jointly request permission to file their reply briefs by June 25, 2020.

Respectfully submitted,
FRENCH & CASEY, LLP

/s/ Elizabeth Kimundi

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